

**Transit Agency:**

# **Compliance Review**

**for**

**Iowa 5310/5311 Subrecipient**

**Recipient Form**

**Reviewer Name: Kristin Haar**

**Date:**

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# Introduction

- 1. Description of Agency** including organizational structure, hours of operation, number of full and part time employees and if they are administrative, maintenance, drivers, volunteers, types of services provided, service area, etc.:
- 2. Description of All Services** including main services, services under contract, services where a vehicle is leased to another agency, services where the transit system leases a vehicle from another agency, etc. Please be as descriptive as possible, including days and hours of operation, passenger fare, which agency provides the drivers, does the service have a history of providing incidental service, etc. Please list each service separately:
- 3. Highlight new projects.** Please take this opportunity to tell OPT about any new and exciting projects the transit system has been working on, success stories or failures:
- 4. Provide Driver Logs** detailing all trips provided during the weeks of: Month 2014, and Month 2014.
- 5. Provide CY2014 random drug and alcohol testing data** showing dates and times of testing. Please do not submit driver names and results, only dates and times of all tests conducted.
- 6. Vehicle on-board safety equipment and Title VI Notice.** Please make the following vehicles available during the compliance review to check for required on-board safety equipment (fire extinguisher, bio-hazard kit, first aid kit, triangles, web cutter, flashlight, and reflective vest) and posted Title VI Notice: .
- 7. For fixed route systems only:** One route will be chosen for a ride along during the on-site visit.

## Section 1: Eligibility

Eligibility Questions	Response	Provide Pre-Site Visit	Provide at Site Visit
1. Are all transit services provided by the agency open to the general public? (If yes, go to Question 3.)			
2. If not, describe any services not open to the public and why they are not.			
3. Is the public transit program listed under “bus lines” in the yellow pages of all major phone directories covering the service area?			<b>X</b>
4. How are services advertised to the general public?			<b>X</b>
5. Does the agency own all vehicles used to provide public transportation services? (If yes, go to Question 7.)			
6. If not, who owns vehicles used for these services?			
7. Are all vehicles (owned/not owned) providing service as part of the public transit program marked with the agency name on both sides?			
8. Do all vehicle markings comply with current signage policy?			<b>X</b>
9. Do any vehicle markings indicate specific client orientation? If so, provide vehicle identification number and photo of markings.		<b>X</b>	
10. Does each vehicle display a phone number that can be used to request or inquire about transit services?			
11. What greeting is used to answer phones for each service? How do subcontractors, if any, answer telephones?			
12. Describe any “incidental” services that the agency or its subcontractors provide, and when those services are provided. (Include anything not advertised and operated open to the public. Examples: meal delivery and charters)			
13. Are these incidental services provided with federally funded vehicles?			

<b>Eligibility Questions</b>	<b>Response</b>	<b>Provide Pre-Site Visit</b>	<b>Provide at Site Visit</b>
14. How does the agency track the use of FTA-funded vehicles for incidental services to verify that incidental usage does not exceed 20% on any vehicle?			
15. Does the agency, including subproviders, provide any charter services? If yes, which subproviders? Under which exceptions is the service provided?			
16. How does the agency ensure that subcontractors are complying with the charter regulations?			
17. Has the agency gone through the process to publish a notice of intent that identifies willing and able private charter operators or does the agency limit charters to those agencies that are exceptions to the charter rule [Appendix A – QHSO, government officials, etc.]?			<b>X</b>
18. Does the transit system or its subcontractors operate exclusive school bus service? If yes, does the service qualify for one of the statutory exemptions? Has the system received approval from the FTA Administrator? Does the service operate only with non-FTA funded equipment and facilities? How does the system ensure that subcontractors comply with school bus regulations?			
19. Does the system provide school “tripper” service? If yes, is the service open and promoted to the general public?			
20. Does the system have a written policy describing the process to solicit and consider public comment before raising a fare or carrying out a major reduction of transit service? What is considered a “major” service reduction? How are public comments solicited? How are comments considered in the decision-making process?			<b>X</b>
21. In the past three years, has the transit agency raised a fare or reduced service? Was the reduction considered “major”? Was the public comment process followed? If not, why?			

Eligibility Questions	Response	Provide Pre-Site Visit	Provide at Site Visit
22. If subrecipients provide transit service for the agency, are they responsible for setting their own fares? If so, do those subrecipients have their own policies for soliciting and considering public comments prior to a fare increase or major service reduction? How does the transit agency ensure the subrecipients comply with the public comment process requirements?			
23. How does the transit system ensure inclusive public participation of minority and LEP populations into its public participation procedures, such as soliciting comments on fare increases and service reductions and on its policies and procedures?			
24. How does the system notify the public of their rights under Title VI? Where is the Title VI Notice posted? Where can the public access the Title VI complaint form?			X
25. How does the system ensure that subcontractors comply with Title VI requirements?			
26. Have any civil rights or Title VI complaints or lawsuits been filed against the transit agency or against any of the agency's subproviders? (If no, go to Question 31.)			
27. If so, what was the nature of the complaints/lawsuits and what is the status of resolving them?			
28. Have these complaints or lawsuits been reported to the OPT?			
29. <u>For fixed route systems only:</u> Please detail the transit system's system-wide service standards. Do the standards include measures for vehicle load, vehicle headway, on-time performance, and service availability? What is the transit system's policy on distribution of transit amenities in the community and vehicle assignments?			

## Section 2: Management

Management Questions	Response	Provide Pre-Site Visit	Provide at Site Visit
1. Does the agency purchase services from other transportation providers (subproviders)? If so, list the subproviders and the service they provide.			
2. Does the agency have signed purchase of service contracts with each of the subproviders listed? Have all contracts been submitted to the OPT?			
3. Does the purchase of service (or subprovider) contract pass along all federal requirements connected to the transit program? How does the agency monitor subproviders for compliance with all state and federal requirements?			
4. Does the agency perform reviews and/or site visits to subproviders? If so, how often and what items are reviewed?			
5. Does the agency annually obtain, and keep on file, debarment/suspension certifications from all subprovider services valued over \$25,000? Does the agency confirm that subcontractors are not debarred or suspended by searching the SAM?			
6. Does the agency annually obtain, and keep on file, lobbying certifications from all subprovider services valued over \$100,000?			
7. Are required EEO posters displayed at transit agency office, subcontractors' offices, transit garage, etc?			<b>X</b>
8. Does the agency employ 50 or more transit-related employees? If no, skip to question 11.			
9. In the previous fiscal year, did the agency receive more than \$1 Million in FTA capital or operating funds or a combination thereof? If no, skip to question 11.			

<b>Management Questions</b>	<b>Response</b>	<b>Provide Pre- Site Visit</b>	<b>Provide at Site Visit</b>
10. Does the transit agency have an EEO Program on file with the Iowa DOT? When was it last updated?			<b>X</b>
11. Does the agency transport individuals across state lines with a commercial motor vehicle? (If no, go to Section 3.)			
12. Has the agency registered as a motor carrier with the Federal Motor Carrier Safety Administration of USDOT?			
13. If the agency is registered with the FMCSA, do the commercial motor vehicles display the assigned USDOT numbers?			
14. If the agency is not a unit of state or local government, does the agency follow the Federal Motor Carrier Safety Regulations?			
15. How long after contract closeout are related documents, original driver manifests, and statistics kept?			<b>X</b>
16. How does the transit agency calculate deadhead miles?			
17. <u>For fixed route systems only:</u> Does the transit agency utilize flag stops for pickups along the fixed route? How is the flag stop availability advertised to the general public?			



## Section 3: Financial

Financial Questions	Response	Provide Pre-Site Visit	Provide at Site Visit
1. Does the agency have written internal financial management procedures?			X
2. Does the agency's accounting system track all revenues and expenses attributable to the public transit program?			
3. How are these revenues and expenses clearly identified as being related to the public transit program?			
4. Does the agency have on-file an approved cost allocation plan? Was this plan board approved?			X
5. Is the agency's accounting system set up on an accrual or a cash basis?			
6. How does the agency determine the amount of state and federal funding for each of the agency's services/subproviders?			
7. What other sources of funding are received for the transit services?			
8. How does the agency handle the proceeds from sale of FTA-funded equipment?			
9. How does the agency ensure that the fully-allocated costs of providing incidental services are covered by other than state or federal transit funds?			
10. Does the agency utilize the "municipal transit levy?"			
11. How does the agency ensure that state, federal and transit levy funds are spent only on costs attributable to the public transit program?			
12. What does the agency do with any "profits" earned from provision of incidental services?			
13. What happens to "surpluses" in the transit budget at the end of the fiscal year?			

<b>Financial Questions</b>	<b>Response</b>	<b>Provide Pre-Site Visit</b>	<b>Provide at Site Visit</b>
14. Describe how the agency assures that vendors are paid no later than 3 working days following receipt of a capital reimbursement payment from DOT?			
15. Has the agency received any rebates for items purchased with federal assistance? If so, how was the accounting for those rebates handled?			
16. In the last three years, were there findings in audits relating to FTA or DOT funding programs? If so, what were the findings? What is the status of addressing those findings?			

## Section 4: General ADA

General ADA Questions	Response	Provide Pre-Site Visit	Provide at Site Visit
1. Does the agency have non-ADA vehicles? If yes, how many? Are these in fixed-route or demand-responsive service?			
2. Are ADA service needs met with the current fleet?			
3. Are the agency's spare vehicles ADA compliant?			
4. Are wheelchair users, and other persons with disabilities, charged the same fare as other persons of like age/situation?			
5. Are wheelchairs accepted in all of the agency's service areas?			
6. What happens if the agency receives more requests from persons using wheelchairs for a particular trip or service than the vehicle has securement locations for?			
7. <u>If answer to Question 1 was Yes:</u> How does the agency handle the situation if the agency receives a ride request from a person using a wheelchair in an area or at a time when a non-ADA vehicle is normally used?			
8. Does the agency require that wheelchairs be secured?			
9. Will the agency still transport if driver is not able to secure wheelchair?			
10. What types of wheelchairs will the agency transport?			
11. Are there types of wheelchairs the agency won't transport?			
12. If transporting scooters or other wheelchairs with little structural integrity, does the agency require transfer to a vehicle seat?			
13. Does the agency require that persons using wheelchairs use seatbelts (personal restraints)? If so, are all passengers required to use seatbelts?			

<b>General ADA Questions</b>	<b>Response</b>	<b>Provide Pre- Site Visit</b>	<b>Provide at Site Visit</b>
14. What types of “service animals” are accepted aboard vehicles and in facilities?			
15. How does the agency determine if an animal is a “service animal?”			
16. Can a person not using a wheelchair request to ride a wheelchair lift?			
17. What is the transit agency’s policy for the DOT ADA requirement of requesting that persons sitting in priority seats and any fold-down seats over the securement area vacate those seats when a person with a disability needs to use them?			
18. Do you allow persons to carry compressed oxygen canisters and respirators aboard your vehicles?			
19. Have all drivers been trained to use the wheelchair lifts/ramps and the wheelchair securement system(s)?			
20. Do drivers or mechanics cycle the lifts each day?			
21. Are all wheelchair lifts/ramps, including interlocks, in the fleet in working order?			
22. What efforts have been undertaken to make agency information (such as brochures, schedules, etc.) accessible to persons with visual impairments? Provide examples.			<b>X</b>
23. What arrangements have been made to allow access to dispatch service by persons with hearing impairments? Are these arrangements available for all dispatch/reservations/schedule information outlets?			
24. Does agency literature describe how persons with hearing disabilities may access dispatch?			<b>X</b>
25. Does all literature/advertising include information that all services are open to the general public, including persons with disabilities?			<b>X</b>

General ADA Questions	Response	Provide Pre- Site Visit	Provide at Site Visit
26. Who is/are the public transit agency's designated responsible employee(s) for coordinating the agency's efforts to comply with the ADA's reasonable accommodation/modification rules?			
27. Does the transit agency have adopted complaint procedures for the public use concerning reasonable modification/accommodations? Where are these complaint procedures posted?			
28. For what reasons would the public transit agency deny a request for modification to the agency's policies and practices?			
29. Are the agency's offices accessible to all persons with disabilities?			
30. Are all work stations within the agency accessible to persons with disabilities?			
31. Does the agency have specific locations to where people go to purchase tickets or obtain IDs? (If no, go to Question 29.) If so, are these locations accessible to persons with disabilities?			
32. Are the meeting rooms and facilities in which the agency holds meetings accessible to all persons with disabilities? Are they located on a bus route?			
33. Are such meetings held at times when public transit service is available?			
34. Describe how the agency would accommodate a participant with hearing impairments or speech impairments at one of the meetings. Is this accommodation included in the public notice?			
35. Does the agency have job descriptions for all positions, which describe the "essential functions" of the position?			

## Section 4.1: ADA Fixed Route

ADA Fixed Route Questions	Response	Provide Pre- Site Visit	Provide at Site Visit
1. Do all fixed-route vehicles over 22' have public address systems and separate stop request signaling system in wheelchair securement area?			
2. Do the agency's drivers announce all major intersections, major stops and transfer points?			
3. Will drivers announce other specific stops/locations, if requested by riders?			
4. How does the agency verify compliance with these requirements?			
5. Will drivers deploy lift for persons not in wheelchair upon request?			
6. Has the agency reviewed routes to identify appropriate places to deploy wheelchair lifts/ramps?			
7. How would the driver handle deboarding a wheelchair on a street with crowned pavement and no curbs or sidewalks?			
8. How would the driver handle deboarding a wheelchair on a street with curbs but no sidewalks?			
9. Are there locations where drivers would not allow a person using a wheelchair to get on or off the vehicle?			
10. What means are provided to allow a person with visual disability to find the correct vehicle at stops served by multiple vehicles?			
11. How quickly are vehicles removed from route service once a non-functional lift is reported?			
12. Does the agency allow buses with inoperable lifts to be assigned to route service?			

<b>ADA Fixed Route Questions</b>	<b>Response</b>	<b>Provide Pre- Site Visit</b>	<b>Provide at Site Visit</b>
13. How long might the agency allow a vehicle with a non-functioning lift to be assigned for route service? Does the agency then serve passengers who would normally use that route with paratransit?			
14. Does the agency have passenger shelters, and if so, how many? If no, proceed to Section 4.2.			
15. Are all passenger shelters accessible to wheelchairs? (Accessible pathway/interior space) If not, how many are not?			
16. Has an assessment of shelter ADA compliance been done?			

## Section 4.2: ADA Paratransit

ADA Paratransit Questions	Response	Provide Pre- Site Visit	Provide at Site Visit
1. Describe the service area that is covered with ADA paratransit service.			
2. Does ADA paratransit service operate at all times that fixed-route service is available?			
3. Who is eligible for paratransit service?			
4. How is eligibility determined? What factors are considered when determining an individual's eligibility?			
5. Is income or financial need considered in determining eligibility for ADA service?			
6. Who decides who is eligible?			
7. How long does the eligibility determination process take, from application to approval or denial?			
8. Are visitors to the agency's area eligible for paratransit service?			
9. Can nonresidents apply for permanent eligibility for ADA paratransit services?			
10. Does the agency issue an ID card to paratransit eligible persons?			
11. Does the ID issued distinguish between persons who are ADA eligible and others who may be allowed to ride?			
12. Will drivers/dispatchers honor ADA paratransit IDs issued from any transit agency?			
13. Will drivers go to the door of a passenger's home or drop off location to assist a passenger in getting to/from a paratransit vehicle?			
14. Can an eligible rider call in at 4:00 p.m. today for a ride at 8:00 a.m. tomorrow morning?			
15. How far ahead can ride reservations be made?			
16. How does the agency handle a caller who requests a ride at a time when the paratransit vehicle(s) is/are busy?			



<b>ADA Paratransit Questions</b>	<b>Response</b>	<b>Provide Pre- Site Visit</b>	<b>Provide at Site Visit</b>
17. In an average month how many ride requests is the agency unable to serve within 60 minutes of the requested time?			
18. What percent is this of total ride requests?			
19. Does the agency have records that document this?			
20. Does the agency meet the pick-up schedule set with the rider?			
21. Does the agency have documentation of on-time performance rate for these pick-ups?			
22. How does the agency verify that paratransit trips are not excessively long?			
23. What is the fare for paratransit service? How does this compare to the fare for an able-bodied person to take a similar trip aboard the fixed-route service?			
24. Are there restrictions on how often a particular disabled person can ride the paratransit service?			
25. Are there restrictions on the purposes for which an eligible person with disability may ride the paratransit service?			
26. Can an eligible person with a disability schedule rides to the local Dairy Queen and back to get an ice cream cone?			
27. Does the agency allow non-disabled family members or others to accompany an ADA eligible paratransit rider?			
28. On the average, how many denials does the agency have per month? Does the agency track the reasons for denials?			
29. Does the agency have a suspension policy for a pattern or practice of no-shows?			<b>X</b>
30. Describe any other policies the agency has which would cause ADA eligible persons to be denied service.			<b>X</b>
31. How long does/would such a denial of service last?			
32. Who makes the decision on denial of service?			

<b>ADA Paratransit Questions</b>	<b>Response</b>	<b>Provide Pre- Site Visit</b>	<b>Provide at Site Visit</b>
33. What opportunity for appeal or administrative review is offered?			
34. How are the agency's policies on denial of service documented and communicated to the public?			<b>X</b>
35. Does the agency have a "rider's handbook" describing the agency's policies and procedures relating to the ADA paratransit services?			<b>X</b>

## Section 5: Drug and Alcohol

<b>Drug and Alcohol Questions</b>	<b>Response</b>	<b>Provide Pre-Site Visit</b>	<b>Provide at Site Visit</b>
1. Does the employer (transit agency or subcontractor) have a drug and alcohol testing policy document?			<b>X</b>
2. Does employer's drug and alcohol testing policy indicate that it was adopted by the governing board of the employer?			
3. Is there evidence that policy has been updated and readopted?			
4. Does the policy list a contact person designated by employer to answer employee questions about testing program?			
5. Does the policy list the local job classifications that are subject to testing?			
6. Do all listed job classes appear to fit the definition of safety-sensitive positions per FTA rule?			
7. Does the policy indicate that all testing is done under FTA authority, or does it indicate that additional testing is conducted under other authority?			
8. Does the policy accurately indicate what behaviors are prohibited with regard to drugs and to alcohol under FTA rule?			
9. Does the policy give specifics of the required period of compliance regarding alcohol consumption?			
10. Does the policy address the need for new pre-employment/assignment test for persons out of testing pool for more than 90 consecutive calendar days?			
11. Does the policy either give detailed description of collection and testing procedures and safeguards or make reference to Part 40?			
12. Does the policy state that covered employees are required to submit to testing under the program?			

<b>Drug and Alcohol Questions</b>	<b>Response</b>	<b>Provide Pre-Site Visit</b>	<b>Provide at Site Visit</b>
13. Does the policy describe the consequences of a non-negative drug test or alcohol test equal to or exceeding .04?			
14. Does the policy describe what will constitute a test refusal and the consequences thereof?			
15. Does the policy describe the consequences of an alcohol test result showing Blood Alcohol Concentration (BAC) at least .02, but less than .04?			
16. Does the policy discuss the employee's right to request analysis of the split specimen in the case of a drug "positive" and the procedure for making such request?			
17. Does the policy identify the individuals serving as the MRO and SAP under the program and give their credentials?			
18. If "second chance" is offered, does the policy discuss follow-up testing program?			
19. Does the agency have documentation that each employee has received a copy of the testing policy? Are new copies distributed when the document is updated?			
20. Does the agency have documentation that all employees have received training on the consequences of using illegal drugs and of misusing alcohol?			
21. Does the agency keep a record of employees selected for random testing and whether the tests were actually conducted?			
22. If the agency has had employees selected for random testing, that were not tested, does the agency have documentation of the reasons why the test was not completed?			
23. Describe the security measures taken by the agency to keep employee test records/results confidential.			
24. Are employee test records/results kept in a separate file cabinet with lock?			

<b>Drug and Alcohol Questions</b>	<b>Response</b>	<b>Provide Pre-Site Visit</b>	<b>Provide at Site Visit</b>
25. Is the file cabinet containing employee test records/results actually kept locked, except when accessing a file?			
26. Who has access to these records/results?			
27. How are test results received from the BAT or MRO? Who receives these results? Who files the results?			
28. If an employee authorizes release of test results (possibly to a potential new employer or to a court, etc.), who is involved in transmitting the information?			
29. Describe the security measures taken to keep the list of employees selected for random testing confidential.			
30. Who selects employees for random testing?			
31. Is the agency part of an alcohol and drug testing consortium? If yes, how many organizations take part in the consortium?			
32. If selection is by an outside party, how does the agency receive selection information? Who has access?			
33. Who determines when collection will be conducted for selected employees?			
34. What criteria are used to schedule collections?			
35. How are employees notified to report for collection? Who is involved in notification process?			
36. How much time is employee given from time of notification to report to the collection site?			
37. Are substitutes used to fill in while selected employee reports for collection? If so, how is notification to substitute handled?			
38. If substitutes are not used, how does the agency cover for employee sent to collection site?			
39. Is the collection site informed who will be reporting and when they should arrive? If so who handles this notification?			

<b>Drug and Alcohol Questions</b>	<b>Response</b>	<b>Provide Pre-Site Visit</b>	<b>Provide at Site Visit</b>
40. Does the collection site notify the transit agency once employee has reported (or particularly if employee does not report within specified timeframe?) If so, who is involved in receiving this information?			
41. Do agency's testing records include the time of notification and time of report to collection site for all random tests?			
42. Under what circumstances does the transit agency conduct post-accident testing?			
43. Do agency's testing records document all accidents/incidents, indicating which meet FTA post accident testing thresholds, and documenting reasons why testing was not done for any where driver and/or mechanics were not tested?			
44. Who makes the decision whether to send driver and/or others for collection following a fatal accident?			
45. Who makes the decision whether to send the driver and/or others for collection following a non-fatal accident?			
46. Who decides whether a particular accident involves disabling damage?			
47. How is the decision-maker made aware of accidents? Does this happen quickly enough to allow compliance with the post accident testing timeframes?			
48. What happens if there is an accident and the decision-maker is unavailable?			
49. Does the agency use a form to document post accident decisions regarding testing?			
50. Have there been any accidents which should have triggered testing, but for which no timely testing was conducted? If so, explain why testing was not completed in these cases.			<b>X</b>

<b>Drug and Alcohol Questions</b>	<b>Response</b>	<b>Provide Pre-Site Visit</b>	<b>Provide at Site Visit</b>
51. Have contingent arrangements been made to allow for collections/testing at all times and in all locations that transit service is being provided? (This would include incidental service if FTA-funded vehicles are being used or if counted as part of the agency's statistics for funding.)			
52. Who makes the decision on whether to send an employee for reasonable suspicion testing?			
53. Have these persons/has this person received the required supervisor training to recognize signs of drug use/alcohol misuse?			
54. For non-governmental, private non-profit public transit agencies, do these persons receive a minimum of one hour of refresher training to recognize signs of drug use/alcohol misuse annually?			
55. Does the agency have a form to document determination of reasonable suspicion? Are these kept as part of the testing program records?			<b>X</b>
56. Do agency records verify that all employees hired into safety-sensitive positions have passed an FTA pre-employment drug test before being put on payroll?			
57. Do agency's records verify that any existing non-safety-sensitive employee transferred to safety-sensitive duty has first passed an FTA pre-employment drug test?			
58. Were previous DOT-covered employers from last two years queried about drug and alcohol test results for each new employee hired into safety-sensitive positions?			
59. Were any other DOT-covered employers from last two years queried about drug and alcohol test results for any employee transferred into safety-sensitive position?			
60. Does the agency have policy on employing a person who has previously had non-negative test or test refusal? If so what is it? Is it consistent with the agency's second chance policy?			

<b>Drug and Alcohol Questions</b>	<b>Response</b>	<b>Provide Pre-Site Visit</b>	<b>Provide at Site Visit</b>
61. Has the agency reviewed the credentials of designated MRO and SAP?			
62. Has the agency verified that MRO and SAP functions are (still) being performed by individuals identified in the agency's drug and alcohol testing policy document?			
63. How does the transit agency monitor vendors (ex. Consortia, third party administrators, collection sites, medical review officers, etc.) that support its drug and alcohol testing program to ensure compliance with program requirements?			
64. If the agency subcontracts for any safety-sensitive functions other than third-party maintenance, does contract specifically require compliance with FTA drug and alcohol testing?			
65. How does the transit agency monitor subrecipients with safety sensitive employees to ensure their drug and alcohol testing programs are administered in accordance with the regulations?			
66. Has subcontractor's list of covered employees been reviewed?			
67. Is post accident testing record of subcontractor compared to accident reports received?			
68. If additional drug or alcohol testing is conducted under employer's own authority, is this made clear to employees/collection site/etc.? Are non-federal chain-of-custody forms used?			
69. How long are records maintained relating to verified positive tests and test refusals?			
70. Has the agency been asked about drug and alcohol test results of former employees? Was the query accompanied by signed release? Did the agency provide the requested information in a timely manner?			
71. Has the agency had any job applicants with non-negative test results? If so, were they provided with information on available SAPs?			



<b>Drug and Alcohol Questions</b>	<b>Response</b>	<b>Provide Pre-Site Visit</b>	<b>Provide at Site Visit</b>
72. Are all drivers listed on the vehicle insurance policy included in the random testing pool? If not, why not?			
73. Are the random testing rates of 25-percent for drugs and 10-percent for alcohol achieved?			

## Section 6: Procurement

Procurement Questions	Response	Provide Pre-Site Visit	Provide at Site Visit
1. Has the agency adopted a written code of ethics or standard of conduct to govern the activities of employees, board members, or agents involved in procurements financed with FTA funds?			X
2. Does the agency's code of ethics/standard of conduct detail sanctions or disciplinary actions that shall be taken for violations?			
3. Is the agency's code of ethics/standard of conduct explicit with regard to how potential personal conflicts are to be reported (by whom/to whom) and how the situation will be resolved?			
4. Have procurement procedures been addressed in any agency audits? If so, what was the finding/recommendation?			
5. Have there been any procurement protests over the past three years? If so, what was the outcome?			
6. Have there been any complaints about violation of state and federal law or regulations in procurement actions? If so, what was the complaint and how was it resolved?			
7. Does the agency have a written protest procedure? How does the agency notify the public of this procedure?			X
8. Are the agency's policies and procedures for transit procurements documented?			X
9. When was the agency's policy and procedures officially adopted by the governing board?			
10. What training has been provided to individuals who are responsible for procurements?			
11. What involvement does the agency's policy board have in procurements?			
12. Has the board overturned staff recommendations on any procurements involving transit? If so, explain.			

Procurement Questions	Response	Provide Pre- Site Visit	Provide at Site Visit
13. Are solicitations and contractual provisions reviewed by legal counsel for conflicts with federal procurement law, state or local law, or board policies?			
14. Have there been any violations of the rules governing the acceptance of gifts, gratuities, favors, or anything of monetary value from contractors, potential contractors, or parties to subagreements? If so, were sanctions imposed? If not, why not?			
15. Does the agency incorporate any preference for local vendors or Iowa vendors in procurements using federal funds?			
16. Is the agency aware of any local vendors/suppliers that are owned and run by minorities or women? If so, has the agency made any effort to encourage them to become certified as DBEs? Are these efforts documented and categorized by DBE semi-annual reporting periods?			
17. Describe the agency's efforts to seek out and utilize DBE vendors? Are these efforts documented and categorized by DBE semi-annual reporting periods?			
18. Who makes the determination to seek DBE participation in any particular procurement?			
19. Does the agency administer any race conscious contracts? If not, would you consider administering race conscious contracts, when feasible, to help fulfil our DBE goal?			
20. Does the agency require documentation from vendors/contractors that they have made good faith efforts to seek DBE participation in a particular procurement? What documentation does the agency require to ensure good faith DBE efforts?			
21. Does the DBE program have a "prompt payment" clause?			

Procurement Questions	Response	Provide Pre-Site Visit	Provide at Site Visit
22. Does the DBE program have a monitoring and enforcement mechanism to verify that work committed to DBEs at contract award is actually performed by DBEs?			
23. How does the transit agency ensure that applicable clauses and certifications are included in FTA-funded procurements exceeding the micro-purchase limit and construction contracts over \$2,000? In intergovernmental agreements and subrecipient agreements, if applicable?			
24. Have any items charged to the public transit program over the past three years been purchased from businesses owned by board or staff members of the agency or by members of their families? If so, please explain how a conflict of interest was avoided.			
25. In the past three years, has the agency collected liquidated damages under any transit procurement? If so, were the damages collected credited back to the grant funding the procurement?			
26. Does the agency have signed pre-award and post-delivery audit procurement certifications on file for all revenue vehicles bought over the last three years?			
27. For pre-award and post-delivery audit Buy America certifications, does the agency have the certifications and supporting documents on file?			
28. For Debarment and Suspension certifications, has the agency done a full search on the System for Award Management ( <a href="http://www.sam.gov">www.sam.gov</a> ) to verify excluded parties are not participating in the covered transactions? Is the search documented?			
29. Does the agency have a listing of the purchases/procurements which have been charged to the transit program over the last year?			

<b>Procurement Questions</b>	<b>Response</b>	<b>Provide Pre- Site Visit</b>	<b>Provide at Site Visit</b>
30. Does the agency maintain a record of the history of each procurement charged to the transit program? If so what information is recorded?			
31. How does the transit agency ensure that it performs an independent cost estimate (ICE) before receiving bids or proposals?			
32. As part of its evaluation of bids and proposals prior to award, does the transit agency perform a cost or price analysis? If so, what is involved in that process?			
33. For micro-purchases (under \$3,000), if FTA's non-competitive process is followed, how does the agency assure an equitable distribution of awards among qualified vendors?			
34. When using FTA "micro-purchase" procurement method, how does the agency determine that the price is "fair and reasonable?"			
35. Does the agency use "brand names" in procurement specs? If so, are "equals" allowed and has the agency defined what the salient features of the brand name product are?			
36. Are "emergency" procurements subject to the agency's transit procurement policies and procedures? How many "emergency" procurements were made over the last year?			
37. If advance payments were made under any capital grants, were federal funds drawn down prior to the delivery of the merchandise or performance of the services involved?			
38. Has the agency made progress payments under any FTA capital project? If so was title to the completed work obtained prior to requesting federal reimbursement?			
39. Within the last three years, have any procurements been awarded to other than the lowest responsive and responsible bid/quote? If so, please describe the situation(s).			

## Section 7: Maintenance

Maintenance Questions	Response	Provide Pre-Site Visit	Provide at Site Visit
1. Describe the resources (organizational structure, staffing levels, experience, etc.) assigned to maintenance of FTA and Iowa DOT-funded assets, including resources of a third party contractor if maintenance is contracted. What technical training have maintenance employees had? Does the transit agency have certification requirements for maintenance employees?			
2. How many facilities does the transit agency have? How many each of: maintenance, administrative, and storage?			
3. Are the facilities used for other purposes (i.e. shared with a city or county department?) If so, which ones and how are they used?			
4. Does the agency have maintenance plans for transit vehicles, facilities and equipment? How often are the plans reviewed and updated?			<b>X</b>
5. What does the transit agency's vehicle, facility, and equipment maintenance plan cover?			
6. Who is responsible for maintaining vehicles under a 'use agreement' to subproviders?			
7. Is this documented in the contract with the subprovider?			
8. For vehicles under a 'use agreement' with a subcontractor, what process does the transit agency use to monitor compliance with vehicle maintenance requirements, including ADA requirements?			
9. What does the vehicle maintenance plan cover?			
10. Are records available showing what maintenance has been done on each vehicle?			

<b>Maintenance Questions</b>	<b>Response</b>	<b>Provide Pre- Site Visit</b>	<b>Provide at Site Visit</b>
11. Do the preventive maintenance schedules in the plan meet the minimums required by the manufactures/suppliers/builders?			
12. Are preventive maintenance inspections being done as scheduled? If not, why?			
13. Is all work required by manufacturer's warranty provisions being performed? If not, why?			
14. Does the agency have any federally-funded vehicles which traveled less than 10,000 miles last year?			
15. Has the transit system deferred any vehicle, facility, or equipment maintenance since the last compliance review? Please describe the reasons for deferring.			
16. Is any FTA funded equipment under warranty and if so what is the process for recovering warranty claims?			
17. Does the system have a written maintenance program for its FTA-funded facilities and facility-related equipment?			<b>X</b>
18. Does the maintenance program include inspections and preventive maintenance activities to ensure that assets are protected from deterioration and reach their maximum useful life? Is the program consistent with manufacturers' minimum maintenance requirements for equipment under warranty? What is the system's schedule for facility and equipment preventive maintenance inspections?			
19. Does the maintenance program prescribe a recordkeeping system so that the maintenance history of facilities and equipment is permanently recorded? How is the program documented?			<b>X</b>
20. Does the system's facility maintenance program address maintenance procedures for accessibility features? Do maintenance records indicate that accessibility features are maintained in operating condition?			

## Section 8: Safety and Security

Safety and Security Questions	Response	Provide Pre-Site Visit	Provide at Site Visit
1. Does the agency have a written safety plan?			
2. Does the agency have a written security and emergency management plan? (If no, skip Question 3.)			
3. Is the emergency management plan coordinated with local agencies?			
4. Does each vehicle have the following on-board safety equipment: fire extinguisher, bio-hazard kit, first aid kit, triangles, seatbelt web cutter, flashlight, and reflective vest?			